

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KRISTI GINGRICH,

Plaintiff,

v.

OMS NATIONAL INSURANCE
COMPANY, RRG,

Defendant.

Case No. 19-cv-08423

Honorable Judge Martha M.
Pacold

Honorable Magistrate Judge
Gabriel A. Fuentes

JOINT/AGREED MOTION FOR ENTRY OF CONFIDENTIALITY ORDER

Plaintiff Kristi Gingrich (“Plaintiff”) and Defendant OMS National Insurance Company (“Defendant”) (collectively the “Parties”), through their respective attorneys of record, for their joint/agreed motion for entry of a confidentiality order, states as follows:

1. The instant Complaint alleges causes of action for employment discrimination against Defendant.
2. To litigate this matter, the Parties will need to disclose confidential business information/documentation, financial information, personnel/employment records, personal identity information, and information/documentation not available to the public.
3. As a result, and pursuant to Local Rule 26.2, the Parties propose that the Court enter a form confidentiality order in accordance with the model confidentiality order for the Northern District of Illinois, which is being submitted to the Court by electronic mail in compliance with the Court’s standing order, in both redline and clean versions.
4. The proposed order has been approved by the Parties.

WHEREFORE, Plaintiff Kristi Gingrich and Defendant OMS National Insurance

Company respectfully request that this Honorable Court enter the proposed confidentiality order transmitted to the court, and any such further relief as this Honorable Court deems just and appropriate.

Dated: July 1, 2020

RESPECTFULLY SUBMITTED,

By: /s/ Ethan E. White
Ethan Emery White
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Counsel for Plaintiff

By: /s/ Christopher S. Wunder
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Counsel for Defendant

CERTIFICATE OF SERVICE

I, the undersigned, being first duly sworn upon oath, depose, and say that I caused to be served the foregoing document by electronically filing the same with the Clerk for the U.S. District Court for the Northern District of Illinois, Eastern Division, a copy of which was then forwarded to each attorney of record by CM/ECF on July 1, 2020.

RESPECTFULLY SUBMITTED,

Dated: July 1, 2020

By: /s/ Ethan E. White

EMERY LAW, LTD.

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